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Proposed Counsel to John M. McDonnell,

Chapter 7 Trustee

**UNITED STATES BANKRUPTCY COURT
FOR THE DISTRICT OF NEW JERSEY**

In re:

AMY L. FANG,

Debtor.

Case No. 12-26863(MBK)

Honorable Michael B. Kaplan

Chapter 7

**MOTION TO COMPEL TURNOVER OF DEBTOR'S
ASSETS TO THE CHAPTER 7 TRUSTEE, DIRECTING THE DEBTOR
TO COOPERATE WITH THE TRUSTEE AND HIS PROFESSIONALS,
AND DIRECTING THE PAYMENT OF ATTORNEYS' FEES AND COSTS**

PLEASE TAKE NOTICE that on **October 22, 2012 at 10:00 a.m.**, or as soon thereafter as counsel may be heard, McDonnell Crowley, LLC, proposed counsel for John M. McDonnell, Chapter 7 Trustee (the "Trustee") for the estate of Amy L. Fang, the Chapter 7 Debtor (the "Debtor"), shall move before the Honorable Michael B. Kaplan, United States Bankruptcy Judge, at the United States Bankruptcy Court, U.S. Courthouse, 402 East State Street, Trenton, New Jersey, for entry of an order (i) to compel the Debtor, the Revocable Living Trust Agreement of Zhou Fang (the "Unrelated Trust"), and PNC Financial Services Group, Inc.¹ ("PNC Bank") to turnover to the Trustee various property of the estate, pursuant to sections 105, 521, 541, 542, and 704 of title 11 of the United States Code, 11 U.S.C. §§ 101, *et seq.* (the

¹ a/k/a/ PNC Bank NA.

“Bankruptcy Code”) and Rule 4002 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), (ii) directing the Debtor to cooperate with the Trustee and his professionals, (iii) directing the payment of any attorneys’ fees and costs incurred as a result of the motion, and (iv) granting such other relief as this Court deems just, proper, and equitable (the “Motion”).

PLEASE TAKE FURTHER NOTICE that in support of the Trustee’s motion, the undersigned shall rely upon the Application in support of the Motion and the proposed form of Order filed herewith. The nature of the relief requested does not require that briefs be submitted as required pursuant to D.N.J. LBR 9013-2.

PLEASE TAKE FURTHER NOTICE that objections, if any, to the relief requested in the Motion shall: (i) be in writing; (ii) state with particularity the basis of the objection; and (iii) be filed with the Clerk of the United States Bankruptcy Court electronically by attorneys who regularly practice before the Bankruptcy Court in accordance with the General Order Regarding Electronic Means for Filing, Signing, and Verification of Documents dated March 27, 2002 (the “General Order”) and the Commentary Supplementing Administrative Procedures dated as of March 2004 (the “Supplemental Commentary”) (the General Order, the Supplemental Commentary, and the User’s Manual for the Electronic Case Filing System can be found at www.njb.uscourts.gov, the official website for the Bankruptcy Court) and, by all other parties-in-interest, on CD-ROM in Portable Document Format (PDF), and shall be served in accordance with the General Order, the Supplemental Commentary, and D.N.J. LBR 9013-1, as amended December 1, 2009, so as to be received no later than seven (7) days before the return date of the Motion.

PLEASE TAKE FURTHER NOTICE that unless an objection is timely filed and served, the Motion shall be deemed uncontested in accordance with D.N.J. LBR 9013-1(a) and the relief may be granted without a hearing.

McDonnell Crowley, LLC
Proposed Counsel for John M. McDonnell,
Chapter 7 Trustee

By: /s/ Brian T. Crowley
BRIAN T. CROWLEY

Dated: September 26, 2012